

# **EXHIBIT E**

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**From:** Aaron Cera <aCera@saverilawfirm.com>  
**Sent:** Tuesday, June 25, 2024 5:51 PM  
**To:** Lauter, Judd; Ghajar, Bobby A.; Hartnett, Kathleen; Alvarez, Jessica; Weinstein, Mark; Ghazarian, Colette A  
**Cc:** Joseph Saveri; Cadio Zirpoli; Christopher Young; Matthew Butterick; Holden Benon; Elissa A. Buchanan; Ruby Ponce; Bryan L. Clobes; Alexander Sweatman; Mohammed Rathur; Amy Keller; julwick@dicellolevitt.com; Stameshkin, Liz; Dunning, Angela L.  
**Subject:** Re: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

**[External]**

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Judd,

Thanks for your email.

Plaintiffs are amenable to a mutual two-week extension of the substantial completion date, which would move the deadline to Monday, July 15, 2024.

Confirmed with respect to RFPs 40, 44, and 61-67.

**RFP 45** - Confirmed.

**RFP 53** - Please confirm that, in fact, no organized and granular data on this topic is kept in the ordinary course of business.

**RFP 60** - Confirmed.

Best,  
Aaron

**Aaron Cera**  
Associate

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**JOSEPH SAVERI**  
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**From:** Lauter, Judd <jlauter@cooley.com>  
**Sent:** Tuesday, June 25, 2024 11:15 AM  
**To:** Aaron Cera <aCera@saverilawfirm.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Hartnett, Kathleen <khartnett@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>;

Ghazarian, Colette A <cghazarian@cooley.com>

**Cc:** Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Holden Benon <hbenon@saverilawfirm.com>; Elissa A. Buchanan <EABuchanan@saverilawfirm.com>; Ruby Ponce <rponce@saverilawfirm.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; julwick@dicellolevitt.com <Julwick@dicellolevitt.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>  
**Subject:** RE: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

Counsel,

Further to our call on Friday, please let us know whether Plaintiffs consent to a reciprocal two-week extension of the substantial completion deadline (currently slated for July 1, 2024). On our end, we are making a small production today and are working towards a more substantial production on or before Monday. However, given the volume of documents being reviewed by our team and other competing commitments, it would be prudent to have a short extension of the date. Are you able to get back to us today?

We will get back to you within the next few days on the outstanding issues concerning Plaintiffs' RFP Nos. 40, 44, and 61-67. In the meantime, this email serves as confirmation that the issues raised for the following Requests have been resolved:

- **RFP No. 45** – Meta has conducted a reasonable search for documents in its possession, custody, or control, and has not limited its effort to “documents sufficient to show” the subject matter of the Request. Subject to completion of the review effort that is currently ongoing, our understanding is that we have not located any responsive documents.
- **RFP No. 53** – Meta has conducted a reasonable search for documents sufficient to show costs and, if any, revenues and profits associated with Llama, and has not limited its search and review to “evidence sufficient to show its significant investment in AI research and developing” Llama. As we explained on our call, however, organized and granular data on this topic may not be kept in the ordinary course of business.
- **RFP No. 60** – You represented that this Request was served to elicit a privilege log on the subject matter of the Request, which we have provided. Therefore, any dispute regarding this RFP is resolved.

Please let us know if you disagree with our characterization of the foregoing.

Regards,  
Judd

**Judd Lauter**

Cooley LLP  
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**From:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>

**Sent:** Friday, June 14, 2024 8:36 PM

**To:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman

<[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com); Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>

**Subject:** Re: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

[External]

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Judd,

Thank you for your email. Plaintiffs are available at 10 am on Friday, 6/21. I will follow up with a meeting invite.

Best,  
Aaron

**Aaron Cera**  
Associate

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**From:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>

**Sent:** Friday, June 14, 2024 4:52 PM

**To:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com) <[Julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com)>; Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>

**Subject:** RE: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

External (jlauter@cooley.com)

Report This Email FAQ Skout Email Protection

Aaron,

Following up on this, we have availability from 10:30-11:30 Thursday and Friday morning before 11:30. We might also be able to do Friday from 4-5, if needed.

Regards,  
Judd

**Judd Lauter**

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---

**From:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>

**Sent:** Tuesday, June 11, 2024 6:25 PM

**To:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com); Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>

**Subject:** Re: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

**[External]**

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Hi Judd,

### **Universal Issues**

As an initial matter, in many responses to Plaintiffs' Requests, production is conditioned on Plaintiffs' identification of appropriate search terms. We understand these responses were drafted prior to the entry of the operative ESI Order (ECF 101), which requires Meta to come up with search terms. To that end, we would like confirmation that production is not being held up by any failure to come up with search terms.

Further, the ESI Order under paragraph 7.b provides a validation protocol that contemplates the development of new search terms (if needed) to capture relevant docs located in the Null Set Sample. It also states the new search terms, along with a hit report will be provided to the Requesting Party. To date, we have not received a hit report nor any new search terms. Has Meta followed this procedure for any of our Requests? If so, please provide a hit report and a list of new search terms.

Please inform us about which data sources within Meta's possession, custody, or control have been searched and/or collected from to identify potentially responsive or relevant documents or ESI. ESI Ord., ¶ 6. C.

### **Specific Issues - Set 1**

**RFP 40**

Plaintiffs would like to meet and confer to better understand Meta's position and objections.

**RFP 44**

Plaintiffs dispute Meta's objection to the relevance of seeking materials provided to foreign governments. Plaintiffs believe this is relevant to their claims as many foreign governments have copyright laws analogous to those in the US, and thus material provided to those foreign governments would be helpful to determining the extent of Meta's liability. Plaintiffs would like to meet and confer on this issue to better understand Meta's objection.

**RFP 45**

Meta's proposed narrowing from "All Documents and Communications" to "Documents *sufficient to show*" is improper for this Request. Plaintiffs would like to meet and confer to discuss.

**Specific Issues - Set 2**

**RFP 53**

Plaintiffs would like to meet and confer on the scope of what Meta is willing to search for and produce.

**RFP 60-63**

Plaintiffs would like to meet and confer on the scope of these Requests. Plaintiffs believe that a reasonable diligent search for at least non-privileged responsive documents is warranted.

**RFP 64-66**

Plaintiffs note that Meta has propounded similar Requests upon Plaintiffs yet is apparently refusing to produce responsive material in response to these Requests. Plaintiffs would like to meet and confer to better understand Meta's position.

**RFP 67**

Plaintiffs would like to meet and confer to explain the relevance of this Request and understand whether Meta is willing to conduct a reasonable search for and produce responsive material.

**Scheduling**

Plaintiffs are available to meet and confer on these issues Thursday 3:30 - 5 pm or Friday from 12 - 3 pm. If Meta is unavailable at these times, please propose some alternative times.

Best,  
Aaron

**Aaron Cera**  
Associate

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**JOSEPH SAVERI**  
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**From:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>

**Sent:** Monday, June 10, 2024 5:16 PM

**To:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[j Alvarezlopez@cooley.com](mailto:j Alvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com) <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Stameshkin, Liz <[lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>

**Subject:** Re: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

Hi Judd,

Thanks for your email. We will include Liz and Angela going forward.

We've considered internally, and we think it would be most efficient to meet and confer on universal issues concerning Plaintiffs' Requests Set One and Two, as well as a few specific issues within each set. To that end, we will aim to provide a more substantive list of general and specific issues by tomorrow.

Best,  
Aaron

**Aaron Cera**  
Associate

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**From:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>

**Sent:** Friday, June 7, 2024 6:04 PM

**To:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[j Alvarezlopez@cooley.com](mailto:j Alvarezlopez@cooley.com)>; Weinstein, Mark

<[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

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**Subject:** RE: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

Hi Aaron,

We look forward to receiving details regarding Plaintiffs' concerns on Monday and can provide you with our availability once we've had a chance to consider the issues.

Separately, please be sure to include all of our team on these and future emails, including Liz ([lstameshkin@cooley.com](mailto:lstameshkin@cooley.com)) and Angela ([adunning@cgsh.com](mailto:adunning@cgsh.com)).

Regards,  
Judd

**Judd Lauter**

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---

**From:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>

**Sent:** Friday, June 7, 2024 4:41 PM

**To:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[j Alvarezlopez@cooley.com](mailto:j Alvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com)

**Subject:** Re: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

**[External]**

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Counsel,

Following up on my email from yesterday. Thank you.

Best,  
Aaron

**Aaron Cera**



Associate

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**From:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>

**Sent:** Thursday, June 6, 2024 4:20 PM

**To:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com) <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>

**Subject:** Re: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

Counsel,

We write to schedule a meet and confer regarding Meta's Responses to Plaintiffs' First Set of Requests for Production (RFPs 35-50).

We are available the week of June 10 at the following times:

**Tuesday 6/11 from 12-3 pm or 4-5:30 pm.**

**Wednesday 6/12 from 4-6 pm.**

1.

Please let us know which of these windows works and we will circulate a meeting invite.

Plaintiffs will provide an outline with the specific issues we would like to discuss by EOD Monday.

Best,

Aaron

**Aaron Cera**

Associate

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**From:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>

**Sent:** Friday, April 19, 2024 12:34 PM

**To:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com) <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>

**Subject:** RE: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

Aaron,

We are available on Thursday at 10am. Please send the invite to myself, Liz, Bobby, and Colette.

Thanks,  
Judd

**Judd Lauter**

Cooley LLP  
+1 415 693 2915 office  
[jlauter@cooley.com](mailto:jlauter@cooley.com)

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**From:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>

**Sent:** Thursday, April 18, 2024 10:00 AM

**To:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com)

**Subject:** Re: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

**[External]**

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Counsel,

Thank you for your email. We would like to meet and confer on the RFPs pertaining to training data, i.e., RFPs 1-34. We believe these requests are highly relevant to Plaintiffs' claims, proportional to the needs of the case, and impose a minimum burden on Meta. Fed. R. Civ. P. 26(b)(1).

To expedite a resolution on RFPs 1-34, please confirm your availability for a meeting by the end of week. Thank you.

Sincerely,  
Aaron

**Aaron Cera**  
Associate

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**JOSEPH SAVERI**  
LAW FIRM

601 California Street, Suite 1505  
San Francisco, CA 94108  
T 415.500.6800 x909  
F 415.395.9940

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**From:** Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>

**Sent:** Wednesday, April 17, 2024 8:47 PM

**To:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Alvarez, Jessica <[j Alvarezlopez@cooley.com](mailto:j Alvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com) <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>

**Subject:** RE: Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

External ([jlauter@cooley.com](mailto:jlauter@cooley.com))

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Counsel,

We will get back to you with our availability shortly. So that we are prepared, and to promote a fulsome discussion, it would be helpful and more productive for you to detail the issues and specific responses that you would like to discuss during our call.

Thank you,  
Judd

**Judd Lauter**

Cooley LLP  
+1 415 693 2915 office  
[jlauter@cooley.com](mailto:jlauter@cooley.com)

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**From:** Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>

**Sent:** Tuesday, April 16, 2024 1:10 PM

**To:** Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; Elissa A. Buchanan <[EABuchanan@saverilawfirm.com](mailto:EABuchanan@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>; Heaven Haile <[hhaile@saverilawfirm.com](mailto:hhaile@saverilawfirm.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; [julwick@dicellolevitt.com](mailto:julwick@dicellolevitt.com)

**Subject:** Kadrey v. Meta Platforms // Meet and Confer re Meta's Responses to RFPs Set One

**[External]**

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Counsel,

We write to schedule a meet and confer regarding Meta's Responses to Plaintiffs' First Set of Requests for Production.

We are available the week of April 22 at the following times:

**Tuesday 4/23 from 2-4 pm**

**Wednesday 4/24 from 2-6 pm**

**Thursday 4/25 10 am-2 pm**

1.

Please let us know which of these windows works and we will circulate a meeting invite. Thank you.

Best,

Aaron

**Aaron Cera**

Associate

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**JOSEPH SAVERI**  
LAW FIRM

601 California Street, Suite 1505  
San Francisco, CA 94108  
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